

Exhibit H

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM

Plaintiff,

v.

LISA REYNOLDS-BARBOUNIS

Defendant.

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CIVIL ACTION

NO. 2:19-cv-05697-JS

MOTION FOR SANCTIONS

In order to protect the confidentiality of confidential information produced in discovery by the parties in this case, the parties hereby agree to this Stipulated Protective Order:

1. In responding to discovery in this action, the producing party may designate information produced as “Confidential Information” provided that it is information which the producing party in good faith deems to contain sensitive personal, business or trade secret information. “Confidential Information” does not include information transmitted or otherwise provided, in written or oral form, to any government agency or third party with whom a party does not have an attorney-client relationship.

2. The designation may be done in the course of producing documents for inspection, answering interrogatories, responding to requests for admission, or with respect to specific questions at depositions.

3. Information provided which has been designated as “Confidential Information” by the producing party shall not be used by the receiving party for any purpose except in connection with the preparation for trial and trial of this case. However, this Stipulated Protective Order does not affect the parties’ use of their own information and documents in their possession.

4. Legal counsel receiving information designated as “Confidential Information” shall not disclose such information to any persons other than: 1) lawyers, paralegals, secretaries or other support personnel in the law firms of such counsel assisting in the preparation for trial or trial of this case; 2) experts and consultants retained by legal counsel for assistance in the litigation; 3) the parties to the lawsuit themselves; 4) the Court and court-reporters, and mediator employed in connection with this litigation; 5) authors and recipients of such Confidential Information; and 6) deponents or witnesses in this litigation, and their counsel, during the course of or to the extent necessary to determine whether they should be deponents or witnesses in this action.

5. If Confidential Information is provided to any expert or consultant retained by a party, the party retaining the expert or consultant will obtain a confidentiality agreement with that expert or consultant providing that the Confidential Information will be returned or destroyed at the conclusion of the term where it is necessary to the party retaining the expert or consultant or, in any case, at the conclusion of the litigation, and that the information will not be used for any other reason.

6. Only that information which a party shall in good faith deem to contain sensitive personal, business, or trade secret information shall be designated as “Confidential Information” and the designation of such information as confidential shall constitute a certification by the counsel making the designation that he or she has reviewed the material, that the confidential designation has been made in good faith, and that there are substantial grounds to support such designation.

7. At the conclusion of this case, all information designated as “Confidential Information” shall be returned to the producing party or alternatively shall be destroyed.

8. In the event that any party disputes a confidentiality designation, such party shall provide to the designating party written notice of its disagreement with the designation. In an effort to settle such dispute without judicial intervention, the parties shall meet and confer within five (5) business days after such notice to reconsider the circumstances and explain the bases for maintaining or challenging the designation.

Dated: July 25, 2011

By: _____

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APPROVED AND SO ORDERED:

J.

DATED March 31, 2020

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM

Plaintiff,

v.

LISA REYNOLDS-BARBOUNIS

Defendant.

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CIVIL ACTION

NO. 2:19-cv-05697-JS

MOTION FOR SANCTIONS

ORDER

AND NOW, this _____ day of _____, 2020 upon consideration of the Defendant's Proposed Protective Order, IT IS HEREBY ORDERED that the Protective Order is entered by the Court.

Dated: _____

Honorable Juan R. Sanchez